E, DOUGLAS PRATT-THOMAS

PROFESSIONAL ASSOCIATION

16 CHARLOTTE STREET Charleston, SC 29403

PO DRAWER 22247 CHARLESTON, SC 29413-2247

PHONE: 843.727.2200 FAX: 843.727.2238

WWW.P-TW.COM

C. TRENHOLM WALKER
W. ANDREW COWDER, JR.

JON L. AUSTER
LINDSAY K. SMITH-YANCEY (SC. NC.)
THOMAS H. HESSE (SC. GA.)

E COMMISSION
IAN W. FREEMAN (SC. CA.)
DANIEL S. McQUEENEY, JR.

KATHLEEN FOWLER MONOC



E-MAIL: gtw@p-tw.com DIRECT DIAL: 843.727.2208 DIRECT FAX: 843.727.2231

January 10, 2012

U.S. MAIL [X] FACSIMILE [] FEDERAL EXPRESS [] EMAIL [X]

Michael A. Molony, Esq. Young Clement P.O. Box 999 Charleston, SC 29402

Re:

Kiawah Island Utility, Inc. Our File No.: 5435-007

Dear Michael:

I am responding to your letter of today and other communications by your staff after the hearing seeking KIU's responses to KPOG's second interrogatories. I have enclosed KIU's Objections to KPOG's Second Interrogatories with proof of service. By U.S. Mail I am providing a copy to the Chief Clerk of the PSC and by Email to all counsel of record.

With kind regards, I am,

Sincerely,

PRATT-THOMAS WALKER, P.A.

G. Trenholm Walker

Enclosure (As Stated) GTW\yye

c: Jocelyn Boyd, Chief Clerk and Administrator F. David Butler, Esq. (via Email)

C. Duke Scott, Executive Director (ORS) (Via Email)

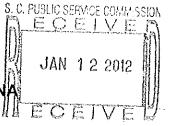
Jeffrey M. Nelson, Esq. (ORS) (Via Email) Shannon Bowyer Hudson, Esq. (ORS) (Via Email)

Jason Scott Luck, Esq. (KICA) (Via Email)

John P. Seibels, Jr., Esq. (KICA) (Via Email) Becky Dennis (Via Email) John F. Guastella (Via Email) Steve Heyboer (Via Email) Robert L. Brooke, Esq. (Via Email) Townsend Clarkson (Via Email)

BEFORE





DOCKET NO. 2011-317-WS

IN RE: Application of Kiawah Island Utility,	
Incorporated for Adjustment of Rate	s
and Charges	

KIAWAH ISLAND UTILITY, INC'S OBJECTIONS TO INTERVENOR KIAWAH ISLAND PROPERTY OWNERS GROUP'S SECOND INTERROGATORIES

The Kiawah Island Utility, Inc. ("KIU" or "Applicant") objects to the Second Interrogatories of Intervenor Kiawah Property Owners Group, Inc. ("KPOG"), dated November 21, 2011, served on November 22, 2011 (incorrectly identified as "First Interrogatories"), and received by KIU on November 23, 2011. KIU hereby objects on the following grounds:

1. Pursuant to S.C. Code of Regulations R. 103-833 (B). "Unless under special circumstances and for good cause shown, written interrogatories shall not be served less than 10 days prior to the date assigned for commencement of hearing." The Notice of Hearing was issued by the PSC Clerk's office on August 15, 2011, scheduling the hearing for November 30, 2011. The Commission conducted its hearing in this matter on November 30, 2011. The Commission closed the record except for one or two supplemental items upon which it requested clarification, neither of which involved response's to KPOG's second Interrogatories. Since KPOG's written Second Interrogatories were not served more than ten days before the scheduled hearing and Commission made no determination of good cause allowing a shorter response time than provided in R

103-83 (B), KIU objects on the basis the discovery was untimely and beyond the scope of permissible discovery under R. 103-833.

- 2. As a further objection, the information sought by KPOG in its second interrogatories is irrelevant to the proceedings in this application and the interrogatories are overly burdensome and vexatious.
- 3. As a final objection, the discovery request is now moot. The hearing concluded on November 30, 2011, and the record of the proceedings was not left open to receive responses to the second interrogatories.

Respectfully submitted

PRATT-THOMAS WALKER, P.A.

G. Trenholm Walker

P.O. Drawer 22247

Charleston, S.C. 29403-2247

T: (843) 727-2208

F: (843) 727-2231

gtw@p-tw.com

ATTORNEYS FOR KIAWAH ISLAND UTILITY, INC.

January 10, 2012

Charleston, South Carolina

BEFORE

THE PUBLIC SERVICE COMMISSION OF SOUTH CAROLINA

DOCKET NO. 2011-317-WS

IN RE:Application of Kiawah Island Utility, Incorporated for Adjustment of Rates and Charges)))	CERTIFICATE OF SERVICE
)	

Undersigned certifies that the pleading or paper to which this certificate is affixed was served upon the party(s) to this action by email addressed to the attorney(s) of record for such other party(s), on this 10th day of January 2012, in Charleston, South Carolina.